

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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MARK BERNSTEIN, individually and as  
Parent and Natural Guardian of ADAM  
BERNSTEIN, an Infant under the age of  
17 years,

**NOTICE OF MOTION**

Plaintiffs,

-against-

11-CV-3677 (ER) – Lead Case

THE VILLAGE OF PIERMONT, MICHAEL  
BETTMAN, DANNY GOSWICK, JR. and  
SAM KROPP,

Defendants.

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MARK BERNSTEIN, Individually and as  
Parent and natural guardian of A. B., an  
infant under the age of 17 years,

Plaintiff,

12-CV-2062 (ER)

-against-

THE VILLAGE OF PIERMONT,

Defendant.

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SIRS:

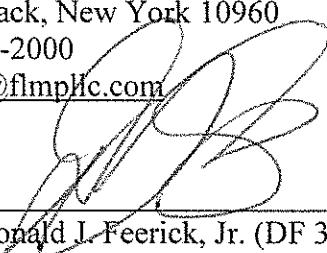
**PLEASE TAKE NOTICE** that upon the Affirmation of Donald J. Feerick, Jr., Esq., dated the 12<sup>th</sup> day of April, 2013, the exhibits annexed thereto, and the accompanying Memorandum of Law, dated the 12<sup>th</sup> day of April, 2013, the Defendant Daniel Goswick, Jr., s/h/a Danny Goswick, Jr., will move this Court before the Hon. Edgardo Ramos, U.S.D.J., Judge of the United States District Court for the Southern District of New York, on the 29<sup>th</sup> day of May, 2013, at 10:00 a.m. on that day, or at such other time as the Court may direct, at the United States Courthouse, 300 Quarropas Street, White Plains, New York, for an Order directing

Defendant Village of Piermont to provide a defense and indemnity to Defendant Daniel Goswick, Jr., under applicable provisions of Chapter 10 of the Village Code of the Village of Piermont, and for such other and further relief as the Court deems just and proper.

Dated: South Nyack, New York  
April 12, 2013

Yours, etc.,

FEERICK LYNCH MacCARTNEY PLLC  
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s/h/a Danny Goswick, Jr.  
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By: 

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